

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**SECOND SUPPLEMENTAL DECLARATION OF CATHERINE STEEGE IN SUPPORT
OF DEBTOR'S APPLICATION FOR ORDER AUTHORIZING THE DEBTOR
TO EMPLOY JENNER & BLOCK LLP AS COUNSEL**

I, Catherine L. Steege, hereby declare:

1. On November 9, 2018, USA Gymnastics (“USAG” or the “**Debtor**”) retained Jenner & Block LLP as counsel in anticipation of filing for chapter 11 relief from this Court.

2. On December 5, 2018 (the “**Petition Date**”), USAG filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

3. On December 21, 2018, the Debtor filed its *Application For Order Authorizing The Debtor To Employ Jenner & Block LLP As Counsel Pursuant To 11 U.S.C. § 327(a), Effective As Of The Petition Date* [Dkt. 105] (the “**Application**”). Attached as Exhibit B to the Application is the *Declaration of Catherine Steege In Support Of Debtor's Application For Order Authorizing The Debtor To Employ Jenner & Block LLP As Counsel Pursuant To 11 U.S.C. § 327(a), Effective As Of The Petition Date* [Dkt. 105-2] (the “**Original Declaration**”).

4. On March 25, 2019, I filed the *First Supplemental Declaration Of Catherine Steege In Support Of Debtor's Application For Order Authorizing The Debtor To Employ Jenner & Block*

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

LLP As Counsel [Dkt. 352] (the “**First Supplemental Declaration**” and, together with the Original Declaration, the “**Prior Declarations**”).

5. In the Prior Declarations, I stated that if any information disclosed therein required subsequent amendment or modification upon Jenner & Block’s completion of further analysis or as additional information regarding creditors and other parties in interest became available, I would file additional supplemental declarations with the Court reflecting the same.

6. Accordingly, I now submit this Second Supplemental Declaration to supplement, but not to supersede in any way, the Prior Declarations.

7. After the Petition Date and the filing of the Prior Declarations, Jenner & Block was retained to represent Davis Graham & Stubbs LLP, one of the Debtor’s creditors, in a matter unrelated to the Debtor’s chapter 11 case. Jenner & Block has not represented, and will not be representing, Davis Graham & Stubbs LLP in the Debtor’s chapter 11 case.

8. Based on the foregoing and the information contained in the Prior Declarations, I believe that Jenner & Block is a “disinterested person,” as defined in section 101(14) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), and does not hold or represent an interest adverse to the Debtor, as required by section 327(a) of the Bankruptcy Code, and that Jenner’s partners, associates, and special attorneys do not hold or represent any interest adverse to the Debtor or its estate. Accordingly, I submit that Jenner & Block is not disqualified for employment by the Debtor under section 327(a) of the Bankruptcy Code.

9. I will amend this Second Supplemental Declaration promptly upon learning that:
(a) any of the representations herein are incorrect, or (b) there is any change of circumstance relating thereto.

I declare under penalty of perjury as provided in 28 U.S.C. § 1746 that the foregoing is true and correct according to the best of my knowledge, information and belief.

Dated: January 21, 2020

/s/ Catherine L. Steege

Chicago, Illinois

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